

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) NO. 03-CR-10356-MLW  
 )  
 FREDERICK A. SIMONE, (1) )  
 a/k/a FREDDY, THE NEIGHBOR; )  
 VINCENT C. GIOACCHINI, (2) )  
 a/k/a DEE DEE; and )  
 FRANCIS WHITE, (3) )  
 a/k/a THE WHITE-HAIRED GUY )

GOVERNMENT'S MOTION TO SEAL AFFIDAVIT OF DETECTIVE LIEUTENANT  
JOHN TUTUNGIAN IN SUPPORT OF PRETRIAL DETENTION

The United States Attorney hereby respectfully moves the Court to seal the Affidavit of Detective Lieutenant John Tutungian in Support of Pretrial Detention, this motion, the Court's order on this motion, all related docket entries and any other paperwork related to this matter until the commencement of the detention hearing. As grounds for this motion, the government states that premature public disclosure of these materials might adversely effect the hearing in this case.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

*Colin Owyang*  
Colin Owyang  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts

This is to certify that a copy of the foregoing motion was delivered by hand this 3rd day of December 2003, to counsel to record.

DOCKETED

*Colin Owyang*  
Colin Owyang  
Assistant U.S. Attorney